



VOSH PROGRAM DIRECTIVE: 02-208A

ISSUED: September 1, 1994

**SUBJECT: Acceptance of U.S. Department of Transportation (DOT) Exemption
DOT-E 8845 of the Select Fire Oil-Well Perforating System
Detonator Interruption Device (DID)**

A. Purpose.

This directive permits the transportation of specially designed and equipped select fire oil-well perforating guns with detonators affixed under certain conditions.

This Program Directive is an internal guideline, not a statutory or regulatory rule, and is intended to provide instructions to VOSH personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.

B. Scope.

This directive applies to all VOSH personnel.

C. References.

OSHA Instruction STD 1-5.18A (July 12, 1994); and
VOSH Standards for General Industry, §1910.109(b)(1)

D. Cancellation.

VOSH Program Directive 02-208 (June 15, 1987)

E. Action.

Directors and Supervisors shall take action to permit the transportation of specially designed and equipped select fire oil-well perforating guns, with detonators affixed, when covered by DOT Exemption DOT-E 8845, and guidelines as set forth in this Directive.

F. Effective Date.

September 1, 1994.

G. Expiration Date.

Not Applicable.

H. Background.

The U.S. Department of Transportation (DOT) granted Exemption DOT-E 8845 to a few companies to transport from the gun assembly site (wireline shop) to the jobsite, specially designed and equipped select fire oil-well perforating guns with detonators affixed. DOT believes that the hazard in transporting the particular assembled gun over the highway has been eliminated.

Federal OSHA concurred with DOT on the highway transportation from the assembly shop to the jobsite and allows further transportation on the jobsite directly to the oil well site, under certain conditions, as cited in section I, below.

This Directive is based upon the need to resolve the potential inconsistency in applying §1910.109(b)(1) and a DOT exemption which permits, under certain specified conditions, the transportation of charged oil-well guns with detonators attached.

I. Procedures.

Under §1910.109(d)(1)(iv), detonators and explosives are required to be transported separately over the highways. While this standard only covers public highways regulated by DOT, federal OSHA believes that the transport of these devices in many off-highway situations may violate §1910.109(b)(1). However, federal OSHA has determined that it is a de minimis violation of §1910.109(b)(1) to transport directly to the oil well site charged oil-well guns with detonators attached, if the gun is covered by DOT Exemption DOT-E 8845 and the Detonation Interruption Device (DID) is in place between each detonator and the primacord leading to the individual jet perforator.

It is thus permissible to use the DOT Exemption DOT-E 8845 in the transportation of charged oil-well guns with detonators attached.

The provisions of the DOT exemption include:

- 1) The charged oil-well guns, classified by DOT as Division 1.1 or Division 1.4 based on UN classification and effective since October 1, 1993 (prior to January 1, 1991, classified as Class A and Class C explosive, respectively), are identified as "Select Fire Hollow Steel Carriers" and "Select Fire Retrievable Tubing Guns" and are the only ones so exempted.
- 2) Transportation must be by motor vehicle or cargo vessel operated by private carriers engaged in oil well operations.
- 3) Transportation is authorized only from the gun assembly site (wireline shop) to the jobsite.

- 4) Vehicle operator must be instructed as to the necessary safeguards and proper procedure in the event of an unusual delay, fire or accident.
- 5) A copy of the Exemption DOT-E 8845 must be carried aboard each motor vehicle and vessel used to transport packages covered by this exemption, attesting that the wireline operator has been granted the Exemption DOT-E 8845 certificate.
- 6) Authorization (DOT-E 8845 (PTE)) forms a part of Exemption DOT-E 8845 and must be attached to it. In cases where an extension has been granted, DOT-E 8845 (Extension), it must also be attached to Exemption (DOT-E 8845), in order for the Exemption to be acceptable to OSHA. These attachments include expiration dates of the exemption for the party(ies) listed as Exemption Holders.

Theron J. Bell
Commissioner

Attachment: None.

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